## NAMI Kitsap County

an affiliate of NATIONAL ALLIANCE FOR THE MENTALLY ILL
PO Box 2343 Bremerton, Washington 98310
360-697-5341 blackfish05@attbi.com

Medical Assistance Administration ATTN: Rich Pannkuk/Medicaid Waiver P.O. Box 4550 Olympia, WA 98504

June 5, 2002

Dear Mr. Pannkuk,

NAMI Kitsap County represents 5000 mentally ill people who suffer from severe brain disorders such as Bi-polar, Panic, Depression, Obsessive Compulsive Disorder and Schizophrenia. We are writing to you to provide you with our comments about the draft 1115 Medicaid Demonstration Waiver by DSHS.

Enrollment Freeze. It is inhuman and cruel to withhold needed medical services from anyone. People with serious brain disorders need treatment provided by community mental health centers such as Kitsap Mental Health Services. Without effective treatment, the mentally ill will end up in a vicious cycle costing the entire communities much more in emergency, law enforcement, court, and hospital costs. Recommend: The state should not be permitted to limit coverage by the number of participants.

Cost Sharing. Premiums of 5 percent are too high when cost of living is taken into account. Recommend: Premiums be set no higher than become for family per manth.

Co-Payments. Recommend: 1) The prescribing physician rather than the client needs to determine whether a brand-name drug is medically necessary or there is no equivalent drug. 2) People go to the emergency room because no one else will provide needed services and, medical treatment should not be withheld for lack of money under any circumstances.

**Benefit Redesign:** The working poor are usually working without medical and dental benefits and there are no other federal programs other than Medicaid that covers dental. Why should poor people have to go without their teeth? **Recommend:** Continue proper dental, vision, and hearing treatment.

Full Use of Currently Unused Federal Funds. Unspent funds should not have to be returned for the use by other states. Recommend: Washington should allocate unspent funds to be used for shortfalls in areas of need like community mental health centers and Triage Centers, before they are returned.

**Tribal Exemption.** The government has a responsibility to honor treaties and agreements, one of which is to provide medical coverage to all American Indians and Alaska Natives. **Recommend:** Exempt all American Indians and Alaska Natives from co-payment and premium requirements regardless of participation in tribal clinics.

**Budget Neutrality.** This provision does not allow for the unexpected medical crisis that could arise without pre-existing planning and medical inflation. For example, the use of methemphedemines in the entire state is at epidemic proportions. Every time a person is picked up for any type of psychotic behavior induced by drugs or broken brain and uses the police, ambulance, hospital, it costs the community. When a person is left untreated they cycle through the system again and again at the same cost or higher when you add the cost of the court system. This money could be better spent establishing a Triage Center and providing funds to the community mental health centers. **Recommend:** Eliminate this clause to allow for the unexpected such as the need for a Triage Center in Kitsap County.

**Optional Services:** At a minimum, the following needed services are currently being used by the mentally ill clients: Blood/blood derivatives/blood administration, community mental health centers, dental services, dentures, detoxification, drugs and pharmaceutical supplies, eyeglasses and eye exams, hearing aid, inpatient psychiatric services for persons under 21, involuntary commitment, outpatient substance abuse (MICA), and targeted case management. **Recommend:** The entire list of optional services need to be moved to the mandatory category.

Recommended Solution: 1) Reduce the amount of paperwork required of community mental health providers by at least 50 percent. This would free more time to provide direct services to clients. 2) Use tax revenue from cigarettes to fund the medical shortfalls.

3) Lobey Deus Companies to Reduce Costs—Charge Deus Companies for Advertisement.

Revise Anticipated Timeline for Medicaid Reform: A second series of town meetings needs to occur once comments such as these have been received and the plan changed.

This proposal threatens to reduce payments to providers and eliminate needed programs and or services. It would be better for the providers, stakeholders, public, and clients to give input on how best to handle the problem. Change is much more palatable when the people affected have an opportunity to truly participate in planning and decision-making.

Thank you for giving us the opportunity to comment on the draft 1115 Waiver.

Sincerely,

Joyce Willson

President

NAMI Kitsap County